

Exhibit “B”

Attached to:

Defendant Sosa’s Motion in Limine Re:

Exhibits Not Produced Before Order dated 3/22/2021 [Doc. # 74]
Limiting Further Discovery

From: [Carolyn Latti](#)
To: [Nancy A. Kelly](#)
Subject: FW: Activity in Case 1:19-cv-10719-PBS In Re. Captain Juan, Inc. Order on Motion for Extension of Time to Complete Discovery
Date: Monday, March 22, 2021 12:35:08 PM

From: ECFnotice@mad.uscourts.gov <ECFnotice@mad.uscourts.gov>
Sent: Monday, March 22, 2021 12:34:14 PM (UTC-05:00) Eastern Time (US & Canada)
To: CourtCopy@mad.uscourts.gov <CourtCopy@mad.uscourts.gov>
Subject: Activity in Case 1:19-cv-10719-PBS In Re. Captain Juan, Inc. Order on Motion for Extension of Time to Complete Discovery

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United States District Court

District of Massachusetts

Notice of Electronic Filing

The following transaction was entered on 3/22/2021 at 12:34 PM EDT and filed on 3/22/2021

Case Name: In Re. Captain Juan, Inc.

Case Number: 1:19-cv-10719-PBS

Filer:

Document Number: 74(No document attached)

Docket Text:

Judge Patti B. Saris: ELECTRONIC ORDER entered re [73] MOTION for Extension of Time to Extend Deadlines. "Allowed but only with respect to the depositions of the crew members who have been noticed."

Fact Discovery to be completed by 6/30/202, see dkt. no. [73] for all other deadlines. (Baker, Casey)

1:19-cv-10719-PBS Notice has been electronically mailed to:

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Proposed Deadlines
[Doc. # 73] Page 4, Para. 31
attached on next page

26. Claimants are awaiting orders on Petitioner's Motion for Protective Order and Claimant Sosa's Motion to Compel.

27. Claimant Herrera's counsel does not believe it can get the depositions of Petitioner's Rule 30(b)(6) designee, Juan Araiza and Capt. Araiza scheduled between the time of the hearing on motions effecting their deposition, March 26, 2021 and the close of discovery on March 31, 2021.

28. Claimant may need to further notice additional depositions should new information be discovered during the depositions referenced in ¶ 26, *supra*.

29. At the February 11, 2021 status conference, Judge Saris was initially prepared to give the parties an additional six (6) months of additional discovery time. See, Ex. A at 20, 21.

30. Claimant Herrera now moves this Court to extend the discovery deadline by approximately three (3) months beyond the current deadline, still within the six (6) additional months that Judge Saris seemed inclined to provide.

31. Claimant Herrera proposes the following deadlines be amended as follows:

Completion of Fact Discovery:	June 30, 2021
Expert Disclosures:	July 30, 2021
Rebuttal expert disclosures:	August 31, 2021
Experts' depositions completed on or before:	September 31, 2021
Status conference or pretrial conference on or before:	End of October, 2021

32. Claimant does not wish to move the mediation scheduled with Judge Boal currently scheduled for April 30, 2021. See, Doc. 53, 54, 56.